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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)
Plaintiff,) 4:19-CR-06049-SMJ
v.)) NOTICE OF INTENT TO USE
IVAN RENTERIA CASTILLO,)) EXPERT TESTIMONY
DUVIEL HUMBERTO SOLARES)
GASTELUM)
Defendant.)
Plaintiff, United States of America, by and through William D. Hyslop, United States Attorney for the Eastern District of Washington, and Stephanie Van Marter, Assistant United States Attorney for the Eastern District of Washington, respectfully submits the following information/notice, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, of its intent to introduce expert testimony by United States' witness listed below and a summary of the anticipated testimony.¹

¹ This Notice of Expert was prepared by the assigned Assistant United States Attorney and not written or reviewed by the proposed expert. Therefore, this written notice does not contain any adopted statements of the proposed expert witness; any questions from counsel should be derived from reports the proposed expert authored only.

FORENSIC CHEMISTS

Attached please find "Curricula Vitaes" for Forensic Chemist/Scientist, Kaisharra Eldridge and Suk Fulbright of the Drug Enforcement Administration Laboratories. *See*, Government's Exhibit A-1 and A-2. These DEA forensic chemists were assigned to this cause number and therefore conducted the testing for the drug evidence sought to be admitted in this matter. The United States will seek to admit the opinions of these chemists summarized in the lab reports previously provided. Specifically, the United States will seek to admit the results from testing conducted on Exhibits 1B4, 1B5, and Exhibits 25-27. *See*, Discovery Pages 30000001-2, 9-11.

More specifically, the United States will seek to admit their expert testimony as to the chemical testing and analysis conducted on the above referenced samples submitted. This expert testimony will include the chemists opinion as to the type of controlled substance present; the purity of controlled substance and how that relates to the overall weight of each sample; the presence or lack of presence of any cutting agents; and the total weight of each evidentiary item both in purity and mixture and substance of controlled substance present. These proposed experts will also testify as to their background and qualifications, the commonly accepted scientific methodology followed in reaching their conclusions as well as the peer review completed to test the accuracy of their results.

The United States will also provide additional Rule 16 materials to include the raw data, notes and procedures followed for all testing conducted as soon as it is received. The United States will also provide any summary exhibits it intends to utilize in support of this experts testimony prior to trial.

FINGERPRINT SPECIALIST

At trial, the United States intends to present the testimony and opinions of Marisa Bender, Fingerprint Specialist with the Federal Bureau of Investigation, Latent Operations Unit, as it relates to the her testing of FBI Exhibits 1 and 2, drug

1 packaging materials from 1B9 and 1B11 *See*, Discovery Pages 300003-8 and
2 3000012-12.06.

3 Ms. Bender will first testify as to her educational background and expertise in
4 latent print examination. She will then provide expert testimony, as detailed in the
5 above previously provided reports, of her latent print examination of the various
6 exhibits, detailing what was examined and whether any fingerprints suitable for
7 comparison were developed utilizing various forensic methods. In this case, there
8 were no suitable prints present in order to conduct a comparison.

9 The United States also intends to seek expert testimony about why fingerprints
10 are sometimes not found on exhibits submitted for analysis. The United States will
11 also provide additional Rule 16 materials to include the raw data, notes and
12 procedures followed for all testing conducted as soon as it is received. The United
13 States will also provide any summary exhibits it intends to utilize in support of this
14 experts testimony prior to trial.

15
16 DATED this June 5, 2020.

17 William D. Hyslop
18 United States Attorney

19 s/Stephanie Van Marter
20 Stephanie Van Marter
21 Assistant United States Attorney

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CERTIFICATE OF SERVICE

2 I hereby certify that on June 5, 2020, I electronically filed the foregoing with
3 the Clerk of the Court using the CM/ECF System which will send notification of such
4 filing to the following, and/or I hereby certify that I have mailed by United States
5 Postal Service the document to the following non-CM/ECF participant(s):

6 Adam Pechtel: adam@pechtellaw.com

7 Nicholas Wright Marchi: nmarchi@carmarlaw.com

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9
10 *s/Stephanie Van Marter*
11 Stephanie Van Marter
12 Assistant United States Attorney